

# EXHIBIT G

JAMES E. BROWN  
 DONALD P. CHIARI  
 MICHAEL C. SCINTA  
 JAMES M. MUCKLEWEE  
 MICHAEL R. DRUMM  
 THERESA M. WALSH  
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 ELEANOR BLISS FERRY  
 JEFFREY M. SHAIKKE  
 MICHAEL T. BENZ

Of Counsel  
 BRADLEY D. MARBLE

# BROWN CHIARI<sup>LLP</sup>

ATTORNEYS

## THE INJURY LAW CENTER

2470 Walden Avenue  
 Buffalo, New York 14225-4751

TEL 716.681.7190  
 FAX 716.681.8136\*  
 BrownChiari.com  
 \*not for service of process

November 11, 2019

### PARALEGALS

KIMILLE C. KASPEREK  
 HEATHER M. KLING  
 TANYA L. BLEYLE  
 EILENA M. METSCHIL  
 HEATHER A. LARIVEY  
 NADINE A. REFORMAT  
 CHERYL A. PFENDER  
 SARA L. WARREN  
 THERILYN J. JURK  
 JOANNE YANNIELLO  
 JOEL GORSKI  
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 RACHEL M. VOIGT  
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 JILL M. CIRINCIONE  
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 LESLIE A. SHOUPI  
 LEAH M. CHAMBERLAIN  
 MARISSA L. DIRIENZO

### VIA FAX (212-937-3326) & MAIL

William M. Hawkins Esq.  
 LOEB & LOEB LLP  
 345 Park Avenue  
 New York, New York 10154

**RE: *In Re: Absolut Facilities Management LLC et al***  
**Case No. 19-76260**

Dear Mr. Hawkins:

Our office is in receipt of your letter of November 8, 2019, objecting to correspondence of Michele Braun, Esq., dated November 6, 2019, sent pursuant to CPLR §3122-a, upon the basis that the letter violates the automatic stay covering "Debtors" *Absolut Facilities Management, LLC* and *Absolut Center for Nursing and Rehabilitation at Orchard Park, LLC* who have filed Chapter 11 bankruptcy petitions.

Please be advised that the November 6, 2019 letter was not directed to debtors-defendants *Absolut Facilities Management, LLC* or *Absolut Center for Nursing and Rehabilitation at Orchard Park, LLC*, as we respect the automatic stay, under 11 U.S.C §362, in place as to the parties/entities to which it applies.

The November 6, 2019 letter was addressed to Jessica DeMichiel, Esq., of Kaufman, Borgeest & Ryan LLP, as she represents and has answered on behalf of *Israel Sherman*, a named, non-debtor defendant in the *LaSurk v. Absolut Facilities Management, LLC, et al.* (Index No. 805925/2016) action.

It is our understanding that *Israel Sherman* is not a "Debtor" under the Chapter 11 bankruptcy petitions filed by your clients, and the automatic stay under 11 U.S.C. §362 does not apply to him. Indeed, according to our conversation on today's date, you advised that you do not represent non-debtor, *Israel Sherman*.

William M. Hawkins Esq.  
November 11, 2019  
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A trial date in this matter is currently scheduled for December 6, 2019. Non-debtor defendant, *Israel Sherman* is individually responsible for the subject claims pursuant to New York Public Health Law §2808-a. As such, we previously discussed with Mr. Sherman's litigation counsel our intention to move forward with the December 6<sup>th</sup> trial date as against him.

The November 6, 2019 letter was sent in compliance with our obligations under CPLR §3122-a to advise defense counsel of our intention to offer certified business records, in anticipation of the scheduled trial as against non-debtor defendant, *Israel Sherman*. If you have information or authority to the contrary, please provide same to our office.

Very truly yours,

BROWN CHIARI LLP



Michael C. Scinta

cc: Jessica M. DeMichiel, Esq.